

BOARD OF COUNTY COMMISSIONERS

MINERAL COUNTY
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December 29, 2017

Rio Grande National Forest
Attn: Rio Grande Forest Plan Revision
1803 W Highway 160
Monte Vista, CO 81144

Re: Comments on Forest Plan Revision

Dear Planning Team,

On behalf of Mineral County Board of County Commissioners, please consider this document official comments to the Forest Plan Revision for the Rio Grande National Forest. The County greatly appreciates the opportunity to make these comments and having a voice in the future of the Forest that has such a great social and economic impact on Mineral County.

As you are aware, Mineral County is 96% public land, the greatest majority of that managed by the Divide District of the Rio Grande National Forest, making the Forest our greatest neighbor in both quality and quantity. To that end, there are very obvious and significant impacts of any Forest Revision to the vocation, avocation, and general well-being of Mineral County residents and visitors. Additionally, the connectivity provided by State Highway 149 makes the use of the Forest by residents and visitors to Mineral County tumble into Hinsdale County. For the purpose of these comments the County line in the Forest boundary is basically non-existent.

The approach of these comments, by the County, is from a socio-economic perspective and generally takes a 30,000 foot view of the Plan Revision with a nod to returning the Forest to a healthy condition. The DEIS identifies "human activities impacting the forest at the turn of the (20th) century, including "farming, sheep and cattle raising, lumbering and mining..." It is refreshing that those human activities still have a significant impact on the Forest into the 21st century. By adding recreational pursuits, the list is pretty complete. The County feels strongly that the maintenance of these "human activities" is integral to the socio-economic health of Mineral/Hinsdale County and the towns of Creede and Lake City. Attention to watershed health for irrigation purposes, grazing availability, healthy and prolific timber harvest, openness to continued mineral extraction and allowance for all recreation interests to have space for the desired experience is not just hoped for but expected in the Forest Plan. The County compliments the Forest Planning Team on a job well done in defining four alternatives that seem geared to this effort.

The County, by and large, is not opposed to the proposed action (alternative B). However, alternative C is much more attractive with potentially a more positive impact on the health and well-being of the County economy. In light of the bark beetle epidemic that has decimated so much of the fir/spruce portions of the Forest and the 2013 fire, the County is very interested in seeing a much more aggressive active management scheme applied to future management decisions. Alternative C, by virtue of having broader management areas, more varied recreation opportunities and larger areas available for timber harvest,

appears to give Forest officials many more tools in the toolbox to facilitate decisions and compels active participation in nearly all aspects of the Forest.

Both alternatives B and C offer a great balance between conservation and use and this is the key to a good land management plan. The attributes of Alternative C allows for more "room" to make those decisions in, whether it is a greater number of acres to create developed recreation or more areas to consider for healthy timber harvest options among others. The ability of Forest managers is enhanced with fewer hard restrictions to make decisions to mitigate unforeseen occurrences which is the crux of adaptive management. The County applauds the efforts in this plan to minimize "have-to's" in management decision making and maximizing a more expansive "need-to's" approach in emphasizing adaptive management techniques with timely, on the ground data and the commitment to best available science. The monitoring component of this Plan Revision is integral to making this plan work regardless of the ultimate action plan employed.

The fewer number of management areas outlined in Alternative C gives line officers a greater opportunity to make site specific decisions fit the need and desired condition because there are fewer restrictions tying their hands. At no point should the ability of good managers be compromised by immovable boundaries and accompanying restrictions. The manager should have the latitude to identify the best solution to a challenge. The challenge should not be the limits (well-intentioned as they may be) of the plan. An example of this lies in the difference between Alternatives B and C handling of Roadless areas. In Alternative C, all Roadless areas fall into one management area. As a whole most of the management direction for Roadless areas differ little between Roadless and upper tier Roadless. If a use allowed in a Roadless area encroaches into upper tier Roadless, the discretion of a manager needs to define what should and should not be allowed in upper tier Roadless (within the management constraints already defined in the Colorado Roadless Rule, of course), not a line on a map, for the greater good of the Forest and its health. This same theory applies to timber management, recreation diversity, wildlife habitat, riparian area protection, etc.

This same premise applies to the winter suitability map and the Recreation Opportunity Spectrum for Alternative C. The County does not assume and, in fact, is vehemently opposed to every forest user needing access to every square mile of the forest. However, a less restrictive canvas allows for more reasonable, appropriate solutions to be facilitated. Just because an area has been identified as suitable for winter motorized recreation does not imply that hundreds of over-snow vehicles will be tracking up the area. But if a larger "supply" of suitable areas is available it allows for greater mobility in decision making when timber harvest, wildlife habitat, or wetland protection needs to take precedence in a recreation decision. The last thing the County wants to see happen to the Forest is the sandbox be made smaller by lines on the map that prohibit active, on the ground decision making.

The proposed ROS in Alternative C speaks to the same thought process. There are no "motorized only" areas on the Rio Grande National Forest. However, there are, by default several hundred acres of "non-motorized only" areas through existing Wilderness, Recommended Wilderness and designated Natural Areas. Non-motorized recreation can happen anywhere Forestwide, motorized and mechanized recreation is strictly prohibited in extensive areas of the Forest. Further limiting motorized and mechanized access doesn't seem wise. The 40/60 non-motorized/motorized proposed in the ROS of Alternative C speaks to the same decision making mobility mentioned earlier. Since non-motorized realistically can happen on 100% of the Forest, allowing opportunities to exist in 60% of the Forest for motorized and mechanized travel only seems fair. The County realizes that "experience" is a unique factor considered in determining what is appropriate for each recreation pursuit. Having a larger area to locate

different recreation pursuits has value in better determining that “experience” factor – limits are few, advantages are great, in giving the line officers more discretion to make the right decisions.

Since the Counties are largely responsible for Search and Rescue operations in the Upper Rio Grande and our first responders, law, fire and EMS, are the first line of defense for users in the Forest it is desirable, if not imperative, to limit the hurdles they encounter in accessing forest areas. The topography of the Forest is challenge enough to get to back country users, not being able to use every means available to them threatens life and limb of these users and compromises the success of these missions.

The final piece of this discussion is the absence of recommended Wilderness in Alternative C. The Rio Grande National Forest is unique in the general availability of access to the Wilderness Areas encompassed in the Forest. It takes little effort to visit Wilderness and the appreciation of that prospect lends to a more discerning user that values this special opportunity and their part in stewardship of these magnificent lands. Residents of and visitors to Mineral County appear to be “closer” to the land and understand the importance of conservation behaviors and stewardship goals. But restricting even more land seems overkill in a Forest that already has nearly 23% of its land mass tied up in designated and recommended Wilderness. This figure does not include Wild, Scenic River areas, Research National Areas, Special Interest Areas, Ski Resorts, and Winter Range, all areas that prohibit or restrict motorized and mechanized travel. Thus, Alternative C is very attractive since there are not any recommended Wilderness acres.

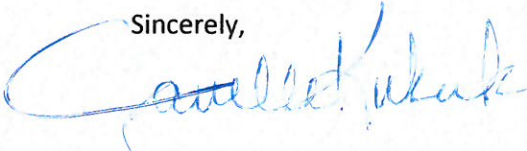
Two elements worked into the premise of the plan are concerning. The first is the assumption that motorized and mechanized travel is not allowed in Roadless areas, both Roadless and upper tier Roadless. Several of your tables, specifically, leave out these uses as viable in these areas and that is factually incorrect and would create a dangerous precedent if left unfixed. Again the discretion of the manager should be the determining factor in what is allowed in these areas, not a missing x or the thought behind the missing x. Please correct this assumed oversight.

The bigger concern is the reliance on the 2000 Lynx Conservation Assessment and Strategy to lay out policy for habitat management for the Canada Lynx. The 2013 LCAS is based on collected data in several field studies and considered best available science, whereas, the 2000 LCAS is based on assumptions, many of which have been disproved or altered in the 2013 LCAS. It seems very short-sighted to depend on outdated science in this particular policy creation. Further it is disappointing that the 2013 LCAS isn't even mentioned in the Plan Revision. The County is a proponent of the efforts to bolster Lynx populations and protect and maintain Lynx appropriate habitat and are proud of the efforts that have been successfully made to create and maintain those protections. However, an obvious unwillingness to deviate from assumed and accepted Lynx management policy is just wrong. The County implores the Planning Team to revisit this section of the Plan and at minimum compare major components of the two versions of the LCAS and make necessary changes to policy statements where best available science supports it. The potential for restrictions and prohibitions to smart Forest use and stymied Forest management based on outdated science would be a travesty.

In conclusion, the efforts in the Plan Revision are well recognized as a doable venture to return the Rio Grande National Forest to a healthy, vibrant and useful forest once again. Mineral County's reliance on the Forest for livelihoods, recreation pursuits, scenic value, solitude and restoration of our collective souls can't be understated. Allowing the greatest spectrum of opportunities for use and visitation is imperative to the long term viability of the economy of Mineral County. The stewardship partnership that exists between the Forest and the County is nearly forged in iron and will continue to be to maintain the value

of the Forest to this County. The success of the relationship has been the understanding that the residents of and visitors to Mineral County rely on the Forest for nearly everything and anything that limits that reliance will be devastating to the economy of the County. It is the hope of the County that the Planning Team recognizes the importance of keeping this Forest a "people's Forest". This can be accomplished by keeping opportunities flexible and open and "out of the box" solutions aren't overlooked or stymied by too many, potentially arbitrary lines on a map. We commend the efforts of the whole Planning Team and Forest leadership and look forward to further dialogue to our mutual advantage.

Sincerely,



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cc: Mineral County BOCC